DEIS-APPENDIX 4

CORRESPONDENCE

NAVIGATION IMPROVEMENTS
DELONG MOUNTAIN TERMINAL, ALASKA

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Fairbanks Fish and Wildlife Field Office
101 12th Avenue, Box 19, Room 110
Fairbanks, Alaska 99701
January 13, 2004

Memorandum

To: Guy R. McConnell, Chief Environmental Resources Section, U.S. Army Engineer District, Alaska

From: Ted Swem, Endangered Species Branch Chief - U.S. Fish and Wildlife Service, Fairbanks Fish and Wildlife Field Office

Subject: Endangered Species Act, Section 7 Biological Opinion for the DeLong Mountain Terminal Portsite Expansion

This document transmits the U.S. Fish and Wildlife Service's (Service's) draft biological opinion (BO) based on our review of the U.S. Army Corps of Engineers's (Corp's) biological assessment (BA) addressing the proposed expansion of the existing DeLong Mountain Terminal (Portsite) facility located 17 miles southwest of Kivalina, Alaska, and its effects on Steller's eiders (*Polysticta stelleri*) and spectacled eiders (*Somateria fischeri*) in accordance with section 7 of the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.). The Corps's August 28, 2003, request for formal consultation was received on September 8, 2003. On September 8, 2003, we sent a letter to the Corps stating that all information required to initiate consultation was either included with their initiation letter or is otherwise accessible for our consideration and reference. This letter also stated that since we had previously reviewed drafts of the biological assessment (BA) and sections of the Draft Environmental Impact Statement (DEIS), we hoped to deliver our final biological opinion to the Corps prior to the 135-day statutory deadline.

The Portsite is located along the migration corridors of spectacled and Alaska-breeding Steller's eiders, both listed as threatened under the Act. Some spectacled eiders and Steller's eiders on route to/back from the Arctic Coastal Plain (ACP) likely pass through the project area. During spring migration, listed eiders likely fly along leads in the pack ice far offshore and do not fly through the project area except under certain inclement weather conditions. Limited telemetry data suggest that during fall migration listed eiders occasionally move through the Portsite area but do not utilize the area as a stopover or staging site.

Based on the information provided on the proposed and potential activities, and the information currently available on listed and proposed species and designated and proposed critical habitat, the Service has determined that it is unlikely that the action will

violate section 7(a)(2) of the Act. Section 7(a)(2) of the Act states that Federal agencies must ensure that their activities are not likely to: 1) jeopardize the continued existence of any listed species, or 2) result in the destruction or adverse modification of designated critical habitat.

The Incidental Take Statement for this non-jeopardy opinion includes reasonable and prudent measures and terms and conditions which, upon finalization of this draft, become mandatory for the Corps to implement. These reasonable and prudent measures and implementing terms and conditions address take from migrants colliding with the proposed trestle/dock infrastructure.

Over the last several months the Service and Corps have worked closely together in reviewing and revising the document. We look forward to working collaboratively with Corps staff in implementing the terms and conditions of the BO. A complete administrative record of this consultation is on file at the Fairbanks Fish and Wildlife Field Office, 101 12th Ave., Box 19, Room 110, Fairbanks, Alaska 99701. A chronology of the consultation history is provided in the Appendix 1. If you have any comments or concerns regarding this BO, please have your staff contact Jonathan Priday, Endangered Species Biologist, Fairbanks Fish and Wildlife Field Office at 907/456-0499.

Attachment

United States Department of the Interior
FISH AND WILDLIFE SERVICE
FAIRBANKS FISH AND WILDLIFE OFFICE
101 12th Ave., Box 19, Room 110
Fairbanks, AK 99701
August 30, 2002

Guy McConnell
U.S. Army Corps of Engineers
Alaska District
P.O. Box 898
Anchorage, AK 99506-0898

Re: Red Dog Mine Port Site

Dear Mr. McConnell:

This responds to your request for information addressing biological resources and coastal resources pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). This information is being provided for use in evaluating the proposed modification to the ship loading facility held by Cominco Alaska. The new project site is in the vicinity of the Red Dog Mine Port near Kivalina, AK.

Although the proposed project site is within the breeding range of the threatened spectacled eider (*Somateria fischeri*), the habitat around the project site is of low quality for nesting so it is likely that spectacled eiders would only be found migrating through the project area. The Alaska breeding population of Steller's eiders (*Polysticta stelleri*), also listed as threatened, breeds and winters outside the range of the proposed projects, but also likely migrates through the area.

Based on the project descriptions and the fact that neither listed eider is thought to nest near the project site, the Service concludes that this project is not likely to adversely impact listed species. Preparation of a Biological Assessment or further consultation under section 7 of the Act regarding these projects is not necessary at this time. This conclusion applies only to endangered and threatened species under our jurisdiction. It does not preclude the need to comply with other environmental legislation or regulations such as the Clean Water Act.

Thank you for your cooperation in meeting our joint responsibilities under the Act. If you need further assistance, please contact Jonathan Priday at (907) 456-0499.

Sincerely,

Ted Swem

Ted Swem
Branch Chief
Endangered Species

United States Department of the Interior
Fish and Wildlife Service
Fairbanks Fish and Wildlife Field Office
101 12th Ave., Box 19, Room 110
Fairbanks, Alaska 99701
August 15, 2003

Lizette Boyer
U.S. Army Corps of Engineers
P.O. Box 6898
Elmendorf AFB, Alaska 99506

Re: Section 7 Consultation for DMT
Portsite, Kivalina, AK

Dear Ms. Boyer:

This responds to your request dated August 14, 2003, for a formal effects determination pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). This information is being provided for the proposed expansion of the existing Delong Mountain Terminal (DMT) Portsite on the eastern Chukchi Sea coastline about 17 miles southwest of Kivalina and 80 miles northwest of Kotzebue, Alaska.

Although the proposed project site is within the breeding range of the threatened spectacled eider (*Somateria fischeri*), the habitat around the project site is of low quality for nesting so it is likely that spectacled eiders would only be found migrating through the project area. The Alaska breeding population of Steller's eiders (*Polysticta stelleri*), also listed as threatened, breeds and winters outside the range of the proposed projects, but also likely migrates through the area. Our principal concern with the proposed project is the potential for listed eiders to collide with the structures associated with Trestle-Channel Alternative during adverse weather conditions.

A Biological Assessment (BA) is required for "major construction activities" if listed species "may be present" in the action area regardless of the likelihood or significance of the effects. Because the proposed project is a "major construction activity" and listed species "may be present" in the action area, a BA or further Section 7 Consultation pursuant to Act is required with the Fish and Wildlife Service for the proposed activity. We concur with the Army Corps of Engineers's (ACE's) determination made on January 3, 2003 that the Trestle-Channel Alternative will adversely impact listed eiders. Should additional information on listed or proposed species become available, this determination may be reconsidered.

The formal consultation process for the project will not begin until we receive a complete BA and a letter from the ACE requesting initiation of formal consultation. It would be extremely helpful if the BA was as accurate and concise as possible. Knowing details about the proposed trestle/piers (lengths, heights, profiles, lighting regime, possible overhead wires, etc.) will be very

important in quantifying of impacts and estimate take of listed species. We will notify you when we receive this information; our notification letter will also outline the dates within which formal consultation should be complete and the biological opinion delivered on the proposed action.

This letter applies only to endangered and threatened species under our jurisdiction. It does not preclude the need to comply with other environmental legislation or regulations such as the Clean Water Act.

Thank you for your cooperation in meeting our joint responsibilities under the Act. If you need further assistance, please contact Jonathan Priday at (907) 456-0499.

Sincerely,

Ted Swem

Ted Swem
Branch Chief
Endangered Species

United States Department of the Interior
FISH AND WILDLIFE SERVICE
FAIRBANKS FISH AND WILDLIFE OFFICE
101 12th Ave., Box 19, Room 110
Fairbanks, AK 99701
August 30, 2002

Guy McConnell
U.S. Army Corps of Engineers
Alaska District
P.O. Box 898
Anchorage, AK 99506-0898

Re: Red Dog Mine Port Site

Dear Mr. McConnell:

This responds to your request for information addressing biological resources and coastal resources pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). This information is being provided for use in evaluating the proposed modification to the ship loading facility held by Cominco Alaska. The new project site is in the vicinity of the Red Dog Mine Port near Kivalina, AK.

Although the proposed project site is within the breeding range of the threatened spectacled eider (*Somateria fischeri*), the habitat around the project site is of low quality for nesting so it is likely that spectacled eiders would only be found migrating through the project area. The Alaska breeding population of Steller's eiders (*Polysticta stelleri*), also listed as threatened, breeds and winters outside the range of the proposed projects, but also likely migrates through the area.

Based on the project descriptions and the fact that neither listed eider is thought to nest near the project site, the Service concludes that this project is not likely to adversely impact listed species. Preparation of a Biological Assessment or further consultation under section 7 of the Act regarding these projects is not necessary at this time. This conclusion applies only to endangered and threatened species under our jurisdiction. It does not preclude the need to comply with other environmental legislation or regulations such as the Clean Water Act.

Thank you for your cooperation in meeting our joint responsibilities under the Act. If you need further assistance, please contact Jonathan Priday at (907) 456-0499.

Sincerely,

Ted Swem

Ted Swem
Branch Chief
Endangered Species

United States Department of the Interior
FISH AND WILDLIFE SERVICE
NORTHERN ALASKA ECOLOGICAL SERVICES
101 12th Ave., Box 19, Room 110
Fairbanks, AK 99701
Dec. 6, 2000

Mr. Guy R. McConnell
Department of the Army
U.S. Army Engineer District, Alaska
P.O. Box 898
Anchorage, Alaska 99506-0898

Re: Construction of a ship loading facility at the Red Dog Mine portsite

Dear Mr. McConnell:

This responds to your request for a list of endangered and threatened species and critical habitats pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). This information is being provided for the construction of a ship loading facility at the Red Dog Mine portsite. The proposed loading facility, known as DeLong Mountain Terminal (DMT), would include a 1,200 to 1,600-foot pier, a dredged entrance channel, and a turning basin for ocean-going bulk carriers. The estimated volume of material to be dredged would be approximately 3,000,000 cubic yards, and disposal of the dredged material would be in a defined area from 3 to 5 miles offshore in about 70 feet of water.

As indicated in your letter, the proposed project site is within the breeding range of the spectacled eider (*Somateria fischeri*), which is listed as threatened under the Act. It is likely that spectacled eiders migrate through the project area and use the adjacent marine waters for molting and wintering. The Alaska breeding population of Steller's eiders (*Polysticta stelleri*), also listed as threatened, breeds and winters outside the range of the proposed project, but migrates through the area.

There is no designated critical habitat in the immediate vicinity of the project. However, critical habitat for the spectacled eider is designated within Ledyard Bay between Cape Lisburne and Icy Cape west to 167°00'W, approximately 75 miles north of the project area. This area is one of the primary molting grounds for female spectacled eiders that breed on the North Slope, and most female birds molting here are from the North Slope (Peterson et al. 1999). Male spectacled eiders from the North Slope appear to molt and stage in equal numbers in Ledyard Bay (Peterson et al. 1999). The area is used by eiders from early July through mid-October.

This letter applies only to endangered and threatened species under our jurisdiction. It does not preclude the need to comply with other environmental legislation or regulations such as the Clean Water Act.

Thank you for your cooperation in meeting our joint responsibilities under the Act. If you need further assistance, please contact Ted Swem at (907) 456-0441.

Sincerely,

Patrick Sousa

Patrick Sousa
Field Supervisor

LITERATURE CITED:

Peterson, M.R., Larned, W.W., and Douglas, D.C. 1999. At-Sea Distribution of Spectacled Eiders: A 120-Year-Old Mystery Resolved. The Auk 116(4):1009-1020.

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Fairbanks Fish and Wildlife Field Office
101 12th Avenue, Room 110
January 19, 2005

Mr. Guy R. McConnell, Chief
Environmental Resources Section
U. S. Army Engineer District, Alaska
Anchorage, AK 99506-0898

Dear Mr. McConnell:

Attached please find a final draft copy of the Fish and Wildlife Coordination Act Report for the DeLong Mountain Terminal Deep Draft Navigation Improvements Project. If you have any questions or require additional information please contact Louise Smith at (907) 456-0306 or me at (907) 456-0324.

Sincerely,

Larry K. Bright
Branch Chief, Project Planning

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

Scanned

September 12, 2003

Guy McConnel
Chief, Environmental Section
U.S. Army Engineer District, Alaska
P.O. Box 6898
Elmendorf AFB, Alaska 99506-6898

Dear Mr. McConnel:

Thank you for your Biological Assessment of the impacts of the Delong Mountain Terminal on threatened or endangered species. Our agency concurs with your determinations regarding threatened and endangered species and their critical habitat, finding the proposed actions and alternatives were not likely to adversely affect the endangered bowhead whale. Therefore, we consider the requirements of section 7 (a)(2) of the Endangered Species Act have been met and no further consultation is required. Please direct any questions to Mr. Brad Smith in our Anchorage office, (907) 271-5006.

Sincerely,

Ronald J. Berg
Deputy Regional Administrator

UNITED STATES DEPARTMENT OF COMMERC
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
222 W. 7th Avenue, #43
Anchorage, Alaska 99513-7577

August 22, 2002

Guy McConnell
U.S. Army Corps of Engineers
Alaska District
EN-CW-ER
P.O. Box 898
Anchorage, Alaska 99506-0898

Re: Red Dog Mine Port Site

Dear Mr. McConnell:

Thank you for requesting information on the occurrence of threatened and endangered species and Essential Fish Habitat (EFH) in the vicinity of the Red Dog Mine Port near Kivalina, Alaska. The National Marine Fisheries Service (NMFS) has reviewed the preliminary information and attended meetings specific to the ship loading facility (held by Cominco Alaska). NMFS offers the following comment specific to section 7 of the Endangered Species Act (ESA), the Marine Mammal Protection Act (MMPA), and EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

Endangered Species

NMFS is responsible for the administration of the ESA as it applies to certain cetaceans and pinnipeds in Alaska. These include seven species of whales (the fin, right, humpback, blue, sperm, sei and bowhead whale) and the Steller sea lion.

The only endangered marine mammal which may occur in offshore marine waters of the Chukchi Sea near the Red Dog Mine Port is the bowhead whale. However, bowhead whales are not expected to be at the project site, and no critical habitat for the listed species has been identified within this area.

Marine Mammal Species

Marine mammal species which are common to the area near Kivalina include the minke, gray, and beluga whale and bearded, spotted and ringed seal. Recently, NMFS completed marine mammal surveys in cooperation with your office and in association with the Red Dog Terminal Expansion project, just to the south of Kivalina.

We hope this information may assist you in your determination and assessment of marine mammal uses near the project site.

Essential Fish Habitat (EFH)

At this time, we feel there is not enough specific information to adequately discuss dredging and disposal activities and whether there exists any potential adverse impact to EFH. Your letter lists several EFH species that are found in waters near the project area such as crab and groundfish. Also, the project area may be within the marine (nearshore) migration corridor for chinook, coho, pink, and sockeye salmon bound for the Wulik and Kivalina Rivers.

Your assessment will need to discuss the range of habitats and species that will be covered or displaced by the fairly large amount of dredged material and dredge area.

However, any action that may adversely affect EFH will require a clearly referenced EFH assessment in either a separate document or a support document, such as an environmental assessment for the project. Should you determine your action *may adversely effect EFH*, then an EFH assessment is required as outlined in 50 CFR Part 600.920. The contents of an EFH assessment are likely included already in some form of your document. However, a clearly referenced EFH assessment will satisfy the requirements of the provisions regarding EFH within the administration of the MSFCMA (16 U.S.C. 1801 et seq.). Should you determine your action *may not adversely effect EFH*, then an EFH assessment is *not* required. Please note the EFH assessment is to be completed by the action agency, if needed. Once an EFH assessment is received by NMFS, the Habitat Conservation Division will then review and offer EFH conservation recommendations, if applicable, for the protection of EFH back to the action agency.

We have established an EFH area on our internet site (click the *"Habitat Conservation (EFH)"* button at http://www.fakr.noaa.gov) which includes the EFH Environmental Assessment, EFH Habitat Assessment Reports, data sets, maps/charts and an EFH search tool for species by latitude/longitude. We continue to expand this site.

We hope this information is useful to you in fulfilling any requirements under section 7 of the ESA and EFH requirements under the MSFCMA. Also, we look forward to working with you throughout the project.

Please direct any questions to Mr. Matthew P. Eagleton in our Anchorage field office at (907) 271-5006.

Sincerely,

P. Michael Payne
Assistant Regional Administrator
for Protected Resources

cc: ADEC, ADFG, ADGC, USFWS, EPA - Anchorage

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
222 W. 7th Avenue, #43
Anchorage, Alaska 99513-7577

August 22, 2002

Guy McConnell
U.S. Army Corps of Engineers
Alaska District
EN-CW-ER
P.O. Box 898
Anchorage, Alaska 99506-0898

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We hope this information may assist you in your determination and assessment of marine mammal uses near the project site.

Essential Fish Habitat (EFH)

At this time, we feel there is not enough specific information to adequately discuss dredging and disposal activities and whether there exists any potential adverse impact to EFH. Your letter lists several EFH species that are found in waters near the project area such as crab and groundfish. Also, the project area may be within the marine (nearshore) migration corridor for chinook, coho, pink, and sockeye salmon bound for the Wulik and Kivalina Rivers.

Your assessment will need to discuss the range of habitats and species that will be covered or displaced by the fairly large amount of dredged material and dredge area.

However, any action that may adversely affect EFH will require a clearly referenced EFH assessment in either a separate document or a support document, such as an environmental assessment for the project. Should you determine your action *may adversely effect EFH*, then an EFH assessment is required as outlined in 50 CFR Part 600.920. The contents of an EFH assessment are likely included already in some form of your document. However, a clearly referenced EFH assessment will satisfy the requirements of the provisions regarding EFH within the administration of the MSFCMA (16 U.S.C. 1801 et seq.). Should you determine your action *may not adversely effect EFH*, then an EFH assessment is *not* required. Please note the EFH assessment is to be completed by the action agency, if needed. Once an EFH assessment is received by NMFS, the Habitat Conservation Division will then review and offer EFH conservation recommendations, if applicable, for the protection of EFH back to the action agency.

We have established an EFH area on our internet site (click the *"Habitat Conservation (EFH)"* button at *http://www.fakr.noaa.gov*) which includes the EFH Environmental Assessment, EFH Habitat Assessment Reports, data sets, maps/charts and an EFH search tool for species by latitude/longitude. We continue to expand this site.

We hope this information is useful to you in fulfilling any requirements under section 7 of the ESA and EFH requirements under the MSFCMA. Also, we look forward to working with you throughout the project.

Please direct any questions to Mr. Matthew P. Eagleton in our Anchorage field office at (907) 271-5006.

Sincerely,

P. Michael Payne
Assistant Regional Administrator
for Protected Resources

cc: ADEC, ADFG, ADGC, USFWS, EPA - Anchorage

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ANCHORAGE, ALASKA 99506-0898

REPLY TO
ATTENTION OF:

MAY 13 2005

Environmental Resources Section

Ms. Michelle Pirzadeh
Director, Environmental Protection Agency Region 10
Office of Ecosystems, Tribal and Public Affairs
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Pirzadeh:

This responds to your letter dated April 27, 2005, regarding dredged material disposal site designation for the Eastern Chukchi Sea. We understand from your letter that USEPA Region 10 concurs with our intent to select a disposal site as authorized by Section 103 of the Marine Protection, Research, and Sanctuaries Act (MPRSA). We also understand that Region 10 and the Alaska District, U.S. Army Corps of Engineers, will work together toward long-term site designation under Section 102 of MPRSA after Congressional authorization. The recognized need for disposal site designation was a principal factor that led the Corps to request EPA to participate in the DeLong Mountain Terminal Navigation Improvement Environmental Impact Statement (DMT EIS) as a cooperating agency. We have worked with Region 10 staff since 2000 to ensure that data needs were identified and met and that information was generated to support disposal site designation. During that period we have provided information to your staff toward site designation and will continue to do so. We appreciate the help your staff has provided throughout this process.

We are preparing a Section 103 evaluation to replace Appendix 2 (Eastern Chukchi Sea Ocean Dredged Material Disposal Site) in the preliminary draft EIS we sent to your staff for inhouse review. We will provide copies of that revised appendix for your information and review as soon as it is completed. To avoid unnecessary redundancy, we are going to minimize the contents of the Section 103 evaluation and heavily reference the draft EIS, which will accompany it. This will allow us to get this document to the public as soon as possible and still conduct the full public disclosure and evaluation intended by the MPRSA. Information to support the evaluation will be presented in the draft EIS. As always, we will attempt to provide Region 10 staff with any information they need for review of this action.

We recognize that the Section 102 ocean disposal site designation is an EPA action and may have different requirements from the Corps action of selecting a dredged material disposal site under Section 103. We also recognize that the Section 102 designation may require an evaluation that stands alone without an accompanying EIS. While our schedule may not allow us to prepare a site evaluation for the draft EIS that would suffice for both Section 103 site selection prior to authorization and Section 102 site designation after authorization, we will be ready to work with your staff after authorization to jointly prepare both the Section 102 evaluation and the site management and monitoring plan.

We look forward to working with you and your staff to complete the review process for the DMT EIS. Please contact me directly if you need any further information. If your staff has any questions or requires further information, please ask them to contact Mr. Guy McConnell (907-753-2614) or Mr. Bret Walters (907-753-2682).

Sincerely,

Phillip L. Hunt
Deputy District Engineer for
Programs & Project Management

NORTHWEST ARCTIC BOROUGH

P.O. BOX 1110
KOTZEBUE, ALASKA 99752
(907) 442-2500 / FAX (907) 442-2930

COOPERATING AGENCY AGRFEEMENT
Between the Northwest Arctic Borough and the U.S. Army Corps of Engineers for the DeLong Mountain Terminal Navigation Improvements Environmental Impact Statement

The U.S Army Corps of Engineers (Corps) is the lead agency preparing an environmental impact statement (EIS) for navigation improvements at DeLong Mountain Terminal (DMT). The DMT is in the Northwest Arctic Borough (Borough), which has planning and regulatory roles that affect development at DMT. Borough planners are a central and valuable source of subsistence, other cultural, and biological information about the people and resources of the Borough and about the issues, concerns, and public involvement needs related to those resources. The Borough administration also represents the interests of the people related to the Borough's cash and subsistence economy as well as the social and cultural interests of Borough residents. Potential for navigation improvements at DMT could affect all Borough residents, but especially those residing in the communities of Kivalina and Noatak.

The Borough and the Corps share the conviction that the Borough should have an integral role in the NEPA process and that both agencies should work together to prepare the DMT EIS for the proposed DMT project. Borough participation will help ensure that information presented in the EIS is accurate and fully addresses concerns of the Borough's residents and that the people are meaningfully involved in the review and decisionmaking processes. Borough participation in preparing and reviewing the EIS will ensure that Borough planning, permitting, and review requirements are acknowledged and effectively incorporated during the EIS process.

The Corps and the Borough therefore agree that the Borough is designated as a cooperating agency in the DMT EIS, and that the Borough and the Corps will work together with the other cooperating Federal agencies in producing this EIS. The working relationship will be in accordance with Council on Environmental Quality regulations for implementing the National Environmental Policy Act and as recommended in the Council's memoranda dated January 30 and February 4, 2002 related to lead agency and cooperating roles and responsibilities in the EIS

process. The Borough and the Corps also agree that this agreement does not waive or otherwise diminish the legal rights or responsibilities of either agency and does not establish any additional legal right or obligation to either agency. Both the Corps and the Borough agree that each shall bear the costs of their own participation and that specific activities by each agency to meet the intent of this agreement shall be mutually coordinated through separate informal correspondence and meetings to support the needs of both the Borough and the Corps in this process. Signatories for both agencies will designate authorized representatives or points of contact for implementation of this agreement.

The Corps and the Borough look forward to a mutually supportive and productive relationship through this agreement.

Roswell L. Schaeffer, Sr.
Mayor
Northwest Arctic Borough

DATE: 4/15/05

Timothy J. Gallagher
Colonel, Corps of Engineers
District Engineer

DATE: 25 Apr '05

EN-CW
Hey McC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

APR 27 2005

Reply To
Attn Of: ETPA-088

Colonel Timothy J. Gallagher
Alaska District Engineer
U.S. Army Corps of Engineers
P.O. Box 6898
Anchorage, Alaska 99506-0898

Re: Dredged Material Disposal Site for the Eastern Chukchi Sea

Dear Colonel Gallagher:

The purpose of this letter is to discuss the proposed dredged material disposal site for the Eastern Chukchi Sea. In 2003, EPA and the Corps considered two options for ocean disposal of the dredged material that will be generated if the proposed DeLong Mountain Terminal channel-trestle project (DMT Project) is constructed. One option was for EPA to designate a long term disposal site under § 102 of the Marine Protection, Research and Sanctuaries Act (MPRSA) (102 Site Designation). An alternative was for the Corps to select an interim disposal site under MPRSA § 103 (103 Alternative Site Selection). At that time, EPA stated that if the DMT Project were authorized and funded by Congress, a 102 Site Designation would be required.

The Corps began developing information on the proposed disposal site. A draft document for a 102 Site Designation was subsequently prepared by the Corps reflecting information developed as of the end of 2004. EPA has reviewed the "Working Draft Eastern Chukchi Sea Ocean Dredged Material Disposal Site" Report (Draft Report), dated December 8, 2004. We are appreciative of the Corps' efforts in developing the information and the draft document.

EPA's review of the Draft Report has led to informal discussions between the Corps and EPA. Given that the DMT Project is not yet authorized by the Corps and Congress, initiating a 102 Site Designation at this juncture is premature. On the other hand, the Corps needs to evaluate potential disposal sites, and needs to disclose to the public and Congress the environmental and economic impacts of using such sites. The Corps has verbally notified EPA that initiating a 103 Alternative Site Selection would meet these needs at this time. Ultimately, if the DMT Project is authorized and funded, it may be appropriate for EPA to proceed with a 102 Site Designation.

The MPRSA §103(b) states that, "In any case in which the use of a designated site is not feasible, the Secretary may, with the concurrence of the Administrator, select an alternative site." Thus, EPA's concurrence is required for a 103 Alternative Site Selection. To that end, EPA requests that the Corps provide the following information:

1. Environmental Studies: The Corps should carry out the same environmental studies that are necessary for a 102 Site Designation in order to evaluate the statutory and regulatory criteria under § 102(a)(A)-(I) and 40 CFR §§ 228.5 and 228.6(a). The Corps seems to have completed a significant amount of this work.

2. Location marked on nautical chart(s): The Corps should plot the location of the selected site and show the potential boundaries on the appropriate current nautical chart using the NAD 83 coordinate system.

3. Disposal Site Designation Study: The Corps should use the data and information from the environmental studies and other pertinent sources to prepare a Disposal Site Designation Study, as defined at 40 CFR § 228.2(d) and as required by 40 CFR §§ 228.4(e)(2) and 228.5(d). The Corps may want to refer to this document as a Disposal Site Selection and Designation Study to reflect the fact that it may be used to support a 103 Alternative Site Selection or a 102 Site Designation.

4. Site Management and Monitoring Plan (SMMP): The Corps and EPA should jointly develop an SMMP that is consistent with § 102(c)(3), 40 CFR § 228.9 and national guidance.

5. Other Statutory Obligations – The Corps should provide EPA with relevant documents that have been developed to address the Corps' statutory obligations under other Acts, such as the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA), Coastal Zone Management Act (CZMA), and Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act). EPA will consider this supporting information in our concurrence determination.

6. Concurrence Document – The Corps should prepare a document for EPA concurrence on the selection of the alternative site. This document could be a letter that defines the location of the 103 Site and transmits the supporting documents.

EPA looks forward to working with the Corps on this project. We welcome periodic meetings or conference calls to share information, work on the joint SMMP and assess progress. If you wish to discuss this letter, please call me at (206) 553-1272, or have your DMT Project manager call Chris Meade at (907) 586-7622. If you have general questions for EPA about the DMT Project, please contact Keith Cohon at (206) 553-2149.

Sincerely,

for Richard B. Parkin

Michelle Pirzadeh, Director
Office of Ecosystems, Tribal and Public Affairs

cc: Guy McConnell, Corps
Julie Anderson, Corps
John Wood, AIDEA
Jerry R. Norton, Sr., President, Kivalina IRA Council

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-6898

REPLY TO
ATTENTION OF:

SEP 15 2005

Environmental Resources Section

Ms. Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3565

Dear Ms. Bittner:

The U.S. Army Corps of Engineers, Alaska District (Corps) is examining navigation improvements in the vicinity of the Portsite at Red Dog Mine, Alaska (Section 10, T25N, R24W, USGS Noatak C-5; figure 1). The proposed project is the Trestle-Channel Alternative described in *Delong Mountain Terminal Navigation Improvements Draft Environmental Impact Statement* (U.S. Army Corps of Engineers, Alaska District, no date). The purpose of this letter is to notify you of a federal undertaking that has the potential to affect historic properties and to seek your concurrence on the assessment of effect.

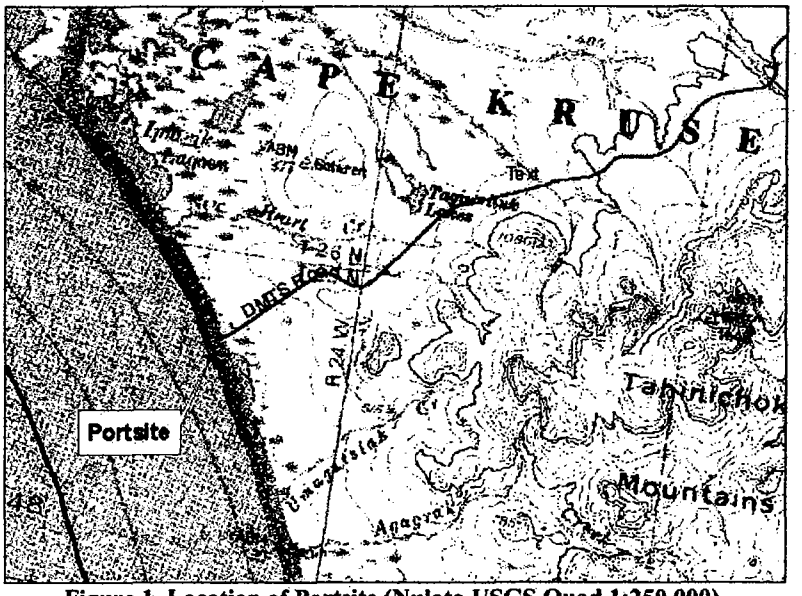

Figure 1. Location of Portsite (Nulato USGS Quad 1:250,000).

Project description

The proposed project includes a trestle, loading platform, fuel line, dredged channel and basin, gravel pads, and several new structures (figure 2 and 3). The loading platform deck would be about 300 feet long, 90 feet wide, and about 40 feet above MLLW (mean low lower water). It

would have five piling clusters, a 90-by 300-foot deck, a pair of movable loaders, and a mooring dolphin and catwalk. A fuel line would connect the onshore tanks to tankers next to the dock. The 1,450-foot bridge-like trestle would support the ore concentrate conveyor, fuel transfer line, electrical power, communication lines, a single-lane road, and other equipment and utilities connecting the platform with onshore facilities. The trestle would be about 35 feet above the water and have five spans about 30 feet high and 20 feet wide. The trestle foundations would be 74-foot-diameter sheet-pile cells. The turning and mooring areas at the loading platform and the channel to deep water would be dredged to a depth of –53 feet MLLW. The channel would extend about 3.5 miles from the dock to deep water in the Chukchi Sea (figure 3).

Under the proposed project, onshore loading facilities would be modified or expanded (figure 2). The alignment of the conveyor system would be modified and equipped with better dust containment features. About 2.5 acres would be filled for the realigned conveyor and trestle. An additional acre would be filled for another fuel storage tank (figure 4). The existing generator building would be expanded, a new diesel generator would be added, and one or more existing generators might be removed or replaced.

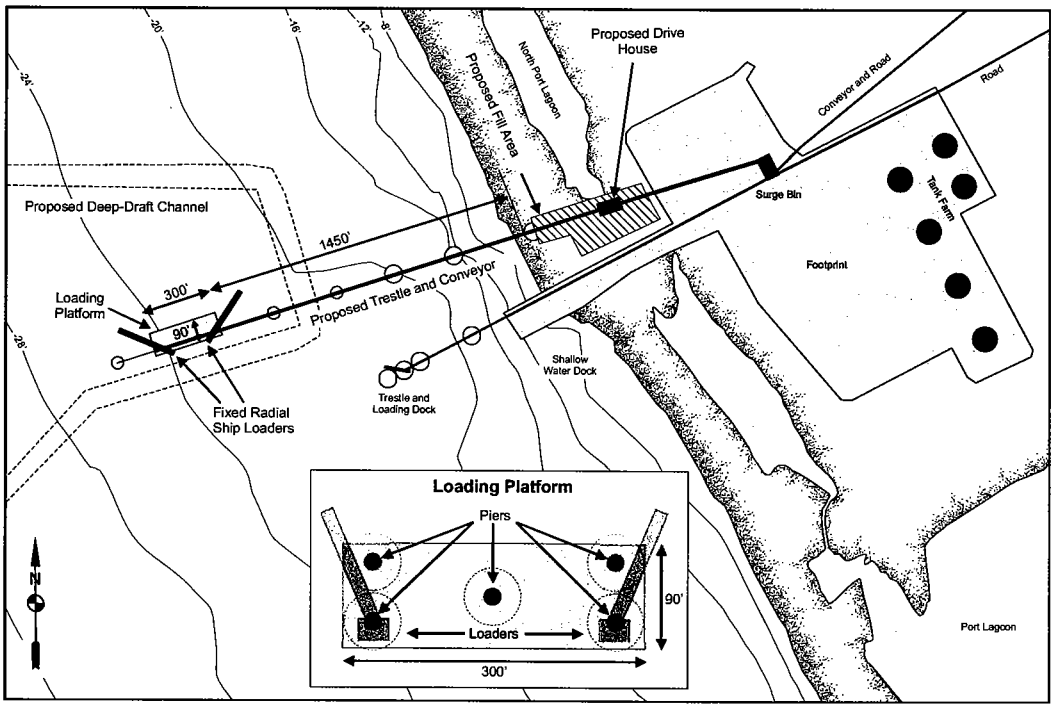

Figure 2. Proposed trestle-channel project.

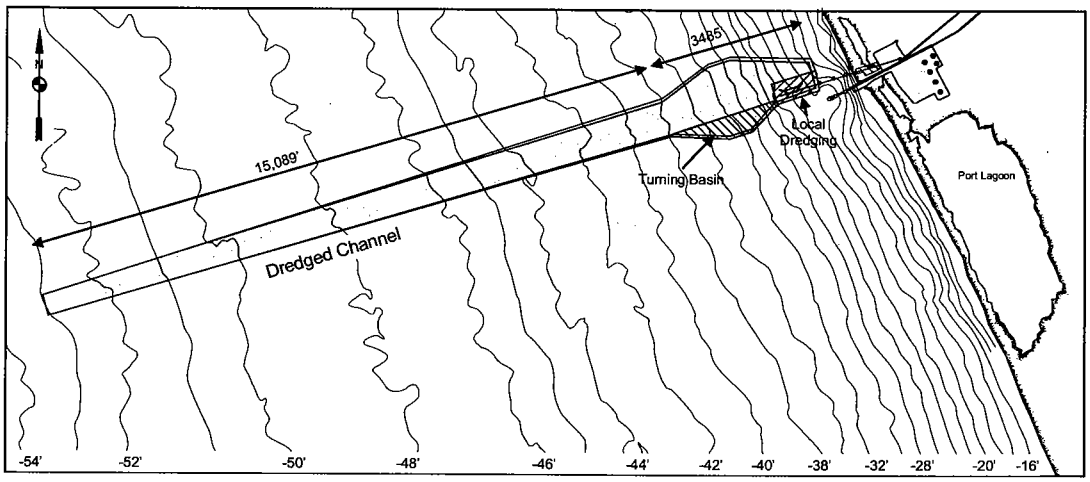

Figure 3. Channel dimensions.

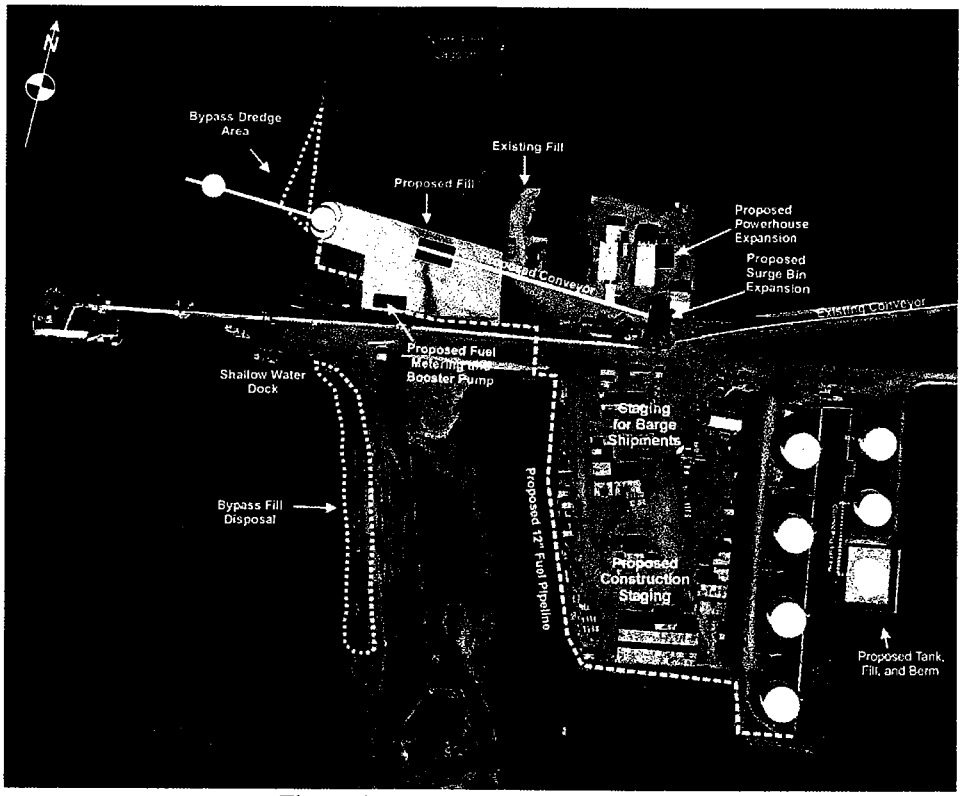

Figure 4. Proposed onshore features.

Corps hydrologists estimate that about 26,000 cubic yards of beach material would accumulate annually in the turning basin. The deeper water of the turning basin and mooring area would reduce wave action on the beach and nearshore intertidal zone at the project, causing material moving along the beach to accumulate shoreward of the turning basin. This material would be removed and placed along the shore south of the terminal to prevent beach starvation and erosion in the area.

Previous archaeological and anthropological work in the area

Robert Spencer conducted anthropological research in Kivalina in the late 1950s. At that time he wrote that Kivalina "is a recent village founded at the turn of the century by a group of inland Eskimo who pushed to the sea" (Burch 1998:24). According to Ernest Burch (1998), he was correct about the founding of the village but mistaken about the people who founded it.

Very little work was done in the Noatak and Kivalina areas until the 1950s. Around that time Charles Lucier wrote an article on *Nuataaġmiut* myths that clearly differentiated for the first time between the *Nuataaġmiut* and *Napaaqtuġmiut*. Don Foote and his associates followed Lucier. As part of Project Chariot, Don Foote and his associates recorded information about the cultures of the people of the Noatak valley from 1959 to 1961 (Burch 1998:60-61). Burch (1998) conducted extensive anthropological and ethnographic work in Kivalina and the lower Noatak River areas throughout the 1960s and 1970s, and reported many fall and spring settlements.

Several major archaeological projects took place in the region in the 1970s. The Alaska Division of Parks conducted an archaeological survey in the Kivalina area in the early 1970s. They reported finding no archaeological sites, but tested near several ice cellars (Bowers and Turney 1975). The Bureau of Land Management surveyed the middle Wulik and Kivalina rivers in 1979. They identified 36 sites with stone tool making debris and one archaeological site (Hall 1986:2). There have been many archaeological surveys conducted as part of the development of the Red Dog Mine. From 1982 to 1985, Edwin S. Hall & Associates surveyed the entire mine area and found many previously unrecorded sites (Hall 1986).

There are two historic properties reported at Portsite (figure 5). **NOA-00074** is George Onalik's reindeer corral and camp. **NOA-00307** is a grave and an ice cellar. Both sites are on the edge of the unnamed lagoon immediately south of the gravel pad at the port site.

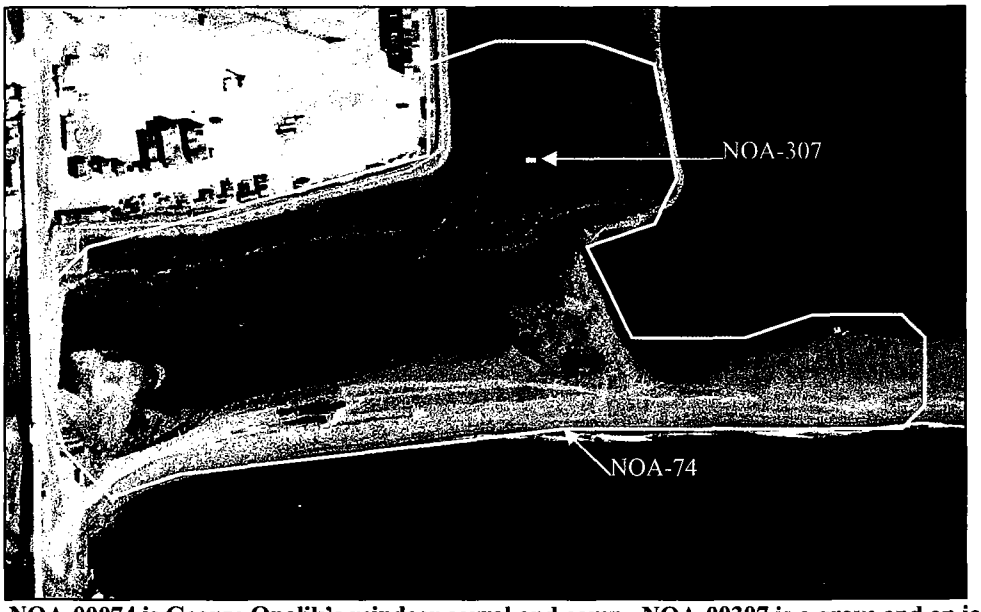

Figure 5. NOA-00074 is George Onalik's reindeer corral and camp. NOA-00307 is a grave and an ice cellar.

NOA-00074 includes a cabin, tent sites, and a reindeer corral. The site is significant because of it's association with George Onalik. Onalik eventually became president of the Kivalina Reindeer Company and worked closely with Chester Seveck, who was famous to Alaskans as a movie star, tour guide, author, and general celebrity. Seveck's memoirs include accounts of reindeer herding near Kivalina. Seveck and Onalik were hired as apprentice herders in 1908 by the Superintendant of Reindeer Service (Seveck, *et al.* 2001). By 1928, Onalik and Seveck combined their herds with two others into one large herd of 6,122 reindeer and formed the Kivalina Reindeer Company (Seveck, *et al.* 2001). Onalik used the camp from at least 1923 to 1940. The cabin was sold in 1940 to George Onalik's brother, who then moved it to Kivalina. The posts from the corral were then sawn off near the ground and sold to people in Kivalina (Cambell 1994:4-5).

Edwin S. Hall & Associates first investigated NOA-00074 and NOA-00307 in 1982 (Hall 1986:9). At that time, an ice cellar (initially described as a semi-subterranean house) and grave were identified. The grave had a wooden headboard and no fence (Bowers and Gerlach 2002:2). The grave and ice cellar were enclosed within a wooden fence in the 1980s (Bowers and Gerlach 2002:3). In 1983, Herbert Onalik (George Onalik's son) pointed out the cabin site and reindeer corral (Hall 1986:24). He stated that the grave was Andrew McClellen's son and that he was buried before the Onalik family moved into the area (Bowers and Gerlach 2002:3). The cabin site, the reindeer corral, and other features were mapped in 1986 (Hall 1986:15; Bowers and Gerlach 2002:2-3).

The site of the cabin was tested and the reindeer corral and other features were mapped in 1986 (Hall 1986:15; Bowers and Gerlach 2002:2). Although the results were never published, Bowers and Gerlach (2002:2) state that "the corral and camp were exposed, mapped, and intensive and extensive excavation were completed." Plans to enclose the grave and ice cellar were also developed (Bowers and Gerlach 2002:2).

In 1994, Chris Rabich Campbell (C.R.C. Cultural Resource Consultant for Cominco Red Dog Mine) and Georgeianne Reynolds (Corps Archaeologist) visited NOA-00074. Campbell reported two fenced areas on the east shore of the lagoon (Campbell 1994:7). Based on her observations, the Onalik reindeer corral was in the shape of a butterfly with chutes and gates through the center. This part of the corral was between the two lagoons south of the port facility (Campbell 1994:7). A long line of posts extended from the corral along the barrier beach, which had once been wider. Campbell and Reynolds excavated two activity areas previously reported by Hall. In one activity area, Hall placed a 7 by 9-meter excavation unit that produced metal cans, burlap, oil-impregnated textiles, and wood fragments. The artifact collection from the other 6 by 7-meter excavation unit was not described (Campbell 1994:7).

Campbell and Reynolds surveyed and tested the peninsula between the two lagoons south of the port. They placed 26 soil probes along four transects. The only cultural material they reported was corral posts in the southwest quarter of the peninsula and eroding from the along the seaward bank of the barrier beach south of the port (Campbell 1994:8). Campbell and Reynolds also placed 22 test units in the mainland area south of the port site. No cultural material was found (Campbell 1994:9). In the area north of the port, they conducted five tests. No cultural material was found in these tests, but one had an organic stain (Campbell 1994:9).

Based on this fieldwork, Campbell determined that the cabin site, associated activity area, and the complex of chutes and fences for reindeer herding were gone. The string of corral posts on the barrier bar, the remains of an historic midden, the grave, and the ice cellar are all that remain of the site (Campbell 1994:10). She concluded, "NOA-074, an historic reindeer corral, does not appear to contain enough integrity to warrant placement on the National Register of Historic Places" (Campbell 1994:12). The grave, midden, and ice cellar were not evaluated as part of NOA-074.

In August 1993, the National Park Service (NPS) and the Alaska State Historic Preservation Officer (SHPO) responded to a proposed change to the port site. They noted that NOA-00074 was never evaluated for the National Register of Historic Places. The SHPO noted that placing fill on the coastal side of the site may act to preserve the site, but that the erosion problem was being caused by the dock interrupting sediment movement. The SHPO and NPS also expressed concerns about how the change to near-shore sediment transport may adversely effect coastal sites southeast of the port (Ted Birkedal, Chief, Division of Cultural Resources, U.S. Department of the Interior, National Park Service Alaska Regional Office to Chief, Environmental Compliance, U.S. Army Corps of Engineers Alaska District, letter, 19 Aug 1993; Judith E. Bittner,

Alaska State Historic Preservation Officer to Robert Oja, Regulatory Branch, U.S. Army Corps of Engineers Alaska District, letter, 31 Aug 1993).

On October 7, 1993, the SHPO concurred with a finding of no adverse effect for changes (Judith E. Bittner, Alaska State Historic Preservation Officer to Robert Oja, Regulatory Branch, U.S. Army Corps of Engineers Alaska District, letter, 7 Oct 1993). This finding implies that either NOA-00074 was not within the area of potential effect or that the site was found not eligible for the National Register of Historic Places. No record of these determinations was found.

In 2002, the grave and cellar, which had been previously included in NOA-00074, were recognized as a separate site – NOA-00307. This site retains integrity and has been determined eligible for the National Register of Historic Places (Pete Bowers 2002 personal communication).

The Cape Krusenstern and Kivalina areas were part of Beringia during the late Pleistocene. Following the logic of current dominant archaeological theory, this was the route people followed as they colonized the Americas about 12,000 years ago. The recovery of Pleistocene mammoth and mastadon tusk fragments from the floor of the Alaskan continental shelf (also called the Bering Land Bridge) by the National Oceanic and Atmospheric Administration has strengthened the idea that people would have followed large grazing animals across the vast steppe tundra (Dixon 1983:113). There have been no underwater surveys to confirm or disprove the theory that information important to our understanding of Beringia and human migration onto the North American continent remains in the vicinity.

Assessment of effects

In the area of existing port facilities, there are several changes proposed by this project including a new loading platform, fuel line, trestle, and changes to the power generators. About 2.5 acres would be filled for the realigned conveyor and trestle. Campbell and Reynolds examined the area north of the port for cultural resources and reported no cultural material (Campbell 1994:9). Based on their findings, there will be no historic properties affected by the construction of a loading platform, fuel line, and trestle. In addition, there will be no historic properties affected by the placement of fill for the conveyor and trestle.

A fuel storage tank would be added to the existing tank farm at the port. This would require one acre of fill east of the existing pad, as illustrated in figure 4. Based on previous archaeological surveys, there would be no historic properties affected by this portion of the proposed project. NOA-00307 has been determined eligible for the National Register of Historic Places, but is outside of the area of potential effect. In addition, TekCominco has placed a fence around NOA-00307 and informs all employees and visitors that the area is to be avoided.

The turning and mooring areas at the loading platform and the channel would be dredged. The channel would be about 3.5 miles long. During scoping and consultation for the environmental impact statement for this project, the National Park Service Division of Cultural Resources expressed concern about the effect of dredging on off-shore cultural resources in the port site area. While the topography of the area off shore of the port site typically has low potential to yield cultural material of this age, there have been no underwater surveys to confirm or disprove this theory. Therefore, there will be no historic properties affected by dredging the channel and basin.

About 26,000 cubic yards of fill would be removed yearly from the channel and placed along the beach south of the existing port facilities. This would prevent beach starvation and erosion in the area. Based previous findings, NOA-00074 is within the area of potential effect, but is not eligible for the National Register of Historic Places. Therefore, there will be no affect to historic properties from this portion of the project. The placement of dredged material along this portion of the beach may reduce the impact of erosion on cultural resources down current from the port by providing sediment that would be transported by currents along the beach.

The work plan for the Delong Mountain Terminal navigation improvements would include guidelines for the discovery of unknown cultural resources. These guidelines conform with regulations of the National Historic Preservation Act (36 CFR 800.13).

We seek your concurrence on these assessments of effect. If you have any questions, please contact Margan Grover (email margan.a.grover@poa02.usace.army.mil or call 753-5670).

Sincerely,

Guy R. McConnell
Chief, Environmental Resources Section

cf:
Oran Knox, Sr., Mayor, City of Kivalina
Jerry Norton, Sr., President, Native Village of Kivalina
Frank Adams, Sr., President, Native Village of Noatak
Ted Birkedal, Chief, Division of Cultural Resources, National Park Service, Alaska Region

References cited:

Bowers, Peter M. and S. Craig Gerlach
2002 Historic Sites in the Vicinity of the Red Dog Port Site. Letter to Kathleen Hagley, Environmental Coordinator, Teck Cominco Alaska Incorporated.

Bowers, Peter and John Turney
1975 *Report of Archaeological Investigations in the Vicinity of the Proposed Noatak and Kivalina Water Systems.* Office of Statewide Cultural Programs, Alaska Division of Parks.

Burch, Ernest S. Jr.
1998 *The Inupiaq Eskimo Nations of Northwest Alaska.* University of Alaska Fairbanks.

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1994 *NOA-074 Revisited: An Archaeological Survey of an Historic Reindeer Corral and Associated Features, Red Dog Mine Port Site, Alaska.* C.R.C Cultural Resource Consultant, Ketchikan, AK.

Dixon, E. James
1983 Pleistocene Probiscidean Fossils from the Alaskan Continental Shelf. *Quarternary Research*, 20:113-119.

Seveck, Chester Asakak, Frank Whaley, and Neva Whaley
1998 Longest Reindeer Herder: A fascinating true life story of an Alaskan Eskimo covering the period from 1890 to 1973. Institute of Social and Economic Research, University of Alaska, Anchorage.
www.alaskool.org/projects/reindeer/history/seveck/Longest_herder.html

U.S. Army Corps of Engineers, Alaska District
2004 Delong Mountain Terminal Navigation Improvements Draft Environmental Impact Statement. U.S. Army Corps of Engineers, Alaska District, Elmendorf Air Force Base, Alaska.

February 2, 2005

Julie L. Anderson
U.S. Army Corps of Engineers
Engineer District, Alaska
Department of the Army
P.O. Box 6898
Elmendorf AFB, Alaska 99506-6898

Julie.L.Anderson@poa02.usace.army.mil phone 753-5685 fax 753-5526

Re: Delong Mountain Terminal Port Expansion
Federal Feasibility Study of Direct Loading Facility

Dear Ms. Anderson:

The Corps of Engineers (Corps) is performing a Feasibility Study and EIS to confirm the technical, environmental, and financial viability of the proposed Delong Mountain Terminal port expansion project. We understand that the Corps and the U.S. EPA are currently working through Draft EIS issues, that the EPA's contractor is scheduled to release a draft EIS "Cumulative Effects" chapter very soon, and that the Feasibility Study and Draft EIS are scheduled to be released for public review in May 2005.

We are writing in support of the Northwest Arctic Borough's (NWAB) request to participate in the remainder of these planning processes as a formal cooperating agency. As the regional municipal government representing the local communities that will be most impacted by the proposed project, we hope you will honor this request.

We recognize and acknowledge that this project would be important to both the Northwest Arctic and North Slope Boroughs given increasing needs to transport resources from the two regions. Expansion would be preferable to developing another port site, which might create environmental concerns.

Thank you for considering the NWAB's request to be a cooperating agency in this important undertaking.

Sincerely,

Ross Schaeffer, Mayor
Northwest Arctic Borough

George Ahmaogak, Mayor
North Slope Borough

ARCTIC ECONOMIC DEVELOPMENT SUMMIT 2005

RESOLUTION SERIAL NO. 2005-01

DeLong Mountain Transportation System Reaffirmation

Whereas, the 4th annual Arctic Economic Development Summit was held in Barrow, Alaska on January 31 and February 1 and 2, 2005, to pursue economic and resource development projects that impact the two regions; and

Whereas, the inaugural summit in 2000 established core vision statements including:

- Maintaining community sustainability by supporting successful economic development while educating, employing and mentoring our young people;
- Maximizing responsible development of our people and natural resources while preserving the environment and traditional ways of life and

Whereas, the inaugural summit established a core goal that stated that economic and resource development are priorities for the residents of the two boroughs under key conditions that maintain traditional uses of the land, promote hire of Native Alaskans, and provide joint venture opportunities with Native corporations;

NOW THEREFORE BE IT RESOLVED:

That the Arctic Economic Development Summit 2005, led by the Northwest Arctic and North Slope Boroughs, reaffirms its position on supporting development of DeLong Mountain Terminal, tank farm and airport projects after further appropriate studies to determine the effects of the development on the economy and resources of the Inupiat as was decided upon.

BE IT FURTHER RESOLVED:

That the Arctic Economic Development Summit 2005, led by the Northwest Arctic and North Slope Boroughs, encourages the completion of the DeLong Mountain Terminal Feasibility Study and Environmental Impact Statement.

BE IT FURTHER RESOLVED:

That the Arctic Economic Development Summit 2005, led by the Northwest Arctic and North Slope Boroughs, supports the Northwest Arctic Borough's request to participate in the remainder of these planning processes as a formal cooperating agency.

INTRODUCED: _____

ADOPTED: _____

George Olemaun, President
North Slope Borough Assembly

Larry Westlake, President
Northwest Arctic Borough Assembly

FEBRUARY 2, 2005
Date

FEBRUARY 2, 2005
Date

George N. Ahmaogak, Sr., Mayor
North Slope Borough

Rosswell Schaeffer, Mayor
Northwest Arctic Borough

ATTEST:

Borough Clerk, NSB

ATTEST:

Borough Clerk, NWAB

February 2, 2005

Julie L. Anderson
U.S. Army Corps of Engineers
Engineer District, Alaska
Department of the Army
P.O. Box 6898
Elmendorf AFB, Alaska 99506-6898

Julie.L.Anderson@poa02.usace.army.mil phone 753-5685 fax 753-5526

Re: Delong Mountain Terminal Port Expansion
Federal Feasibility Study of Direct Loading Facility

Dear Ms. Anderson:

As neighboring Alaska Native claims Settlement Act (ANCSA) regional native corporations, we are writing in support of the Northwest Arctic Borough (NWAB) requesting status as a cooperating agency in the development of the Delong Mountain Transportation System Environmental Impact Statement and Feasibility Study. We believe that the NWAB has the appropriate regional permitting authority and is willing to formally participate in this process.

The NANA Regional Corporation owns 2.2 million acres in the Northwest Arctic Borough and Arctic Slope Regional Corporation owns approximately 5 million acres in the North Slope Borough. This ownership stems from a settlement, in part, of our mutual aboriginal land claims in northern and northwestern Alaska. As landowners and representatives of 20,000 Alaska Native shareholders of these two regions and as resource development partners, this issue is of critical importance to us. The Delong Mountain Transportation System EIS process contemplates significant development in our regions, specifically within the Northwest Arctic Borough.

We appreciate your resolving this matter expeditiously.

Sincerely,

Marie Greene, President
NANA Regional Corporation

Jacob Adams, President
Arctic Slope Regional Corporation

cc: Mayor Schaeffer, Northwest Arctic Borough
Mayor Ahmaogak, North Slope Borough